

SEALED

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12 *Representing the United States of America*

13 UNITED STATES DISTRICT COURT  
14 DISTRICT OF NEVADA

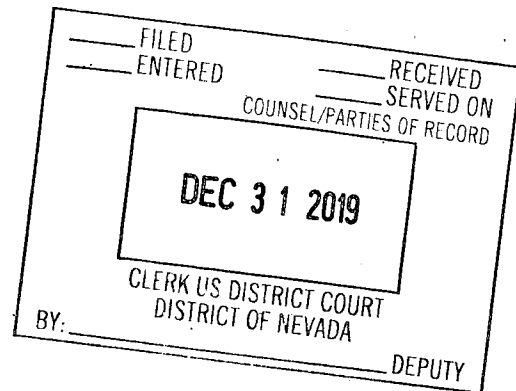
15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 v.

18 JACQUES ANTON LANIER,  
19 A.k.a. "John Dupree,"

20 Defendant.



21 SEALED  
22 CRIMINAL INDICTMENT

23 Case No. 2:19-cr- 327

24 VIOLATIONS:

18 U.S.C. §2422(b) – Coercion and Enticement

18 U.S.C. §1512(b) – Tampering with a Witness,  
Victim, or an Informant

18 U.S.C. § 1591(a) and (b)(2) – Sex Trafficking  
of Children

18 U.S.C. § 2423(b) – Travel with Intent to  
Engage in Illicit Sexual Conduct

18 U.S.C. § 1470 – Transfer of Obscene Material  
to Minor

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1 **THE GRAND JURY CHARGES THAT:**

2 **COUNT ONE**  
3 **Coercion and Enticement**

4 Beginning on or about April 14, 2017, and continuing to on or about September 5,  
5 2017, in the State and Federal District of Nevada,

6 **JACQUES ANTON LANIER**  
7 **A.k.a. "John Dupree,"**

8 defendant herein, while using a facility and means of interstate and foreign commerce, did  
9 knowingly, and attempted to, persuade, induce, entice, and coerce, Victim #2, who had not  
10 attained the age of 18 years, to engage in prostitution and any sexual activity for which any  
11 person could be charged with a criminal offense, to wit: *sex trafficking*, in violation of Nevada  
12 Revised Statutes, Section 201.300(2)(a)(1); and *sex trafficking of children*, in violation of Title 18,  
13 United States Code, Section 1591(a), all in violation of Title 18, United States Code, Section  
14 2422(b).

15 **COUNT TWO**  
16 **Tampering with a Witness**

17 Beginning on or about April 12, 2018, and continuing to on or about March 12, 2019,  
18 in the State and Federal District of Nevada,

19 **JACQUES ANTON LANIER**  
20 **A.k.a. "John Dupree,"**

21 defendant herein, did knowingly intimidate, threaten and corruptly persuade Victim #2:

- 22 (a) with the intent to cause and induce Victim #2 to evade legal process summoning  
23 Victim #2 to appear as a witness in an official proceeding, to wit, a federal  
24 criminal prosecution against defendant for *coercion and enticement*, in violation of  
Title 18, United States Code, Section 2422(b), and

(b) with the intent to hinder, delay, and prevent the communication to a law enforcement officer and judge of the United States, of information relating to the commission and possible commission of a Federal offense, to wit, threatening to disclose Victim #2's past sexual conduct to her parents if she testified in criminal proceedings in court against defendant and coercing Victim #2 to send a notarized letter to law enforcement falsely recanting a prior statement made to law enforcement as being "given under duress and duplicity," and attempted to do so, all in violation of Title 18, United States Code, Section 1512(b)(2)(C) and (b)(3).

**COUNT THREE**  
**Coercion and Enticement**

Beginning on or about May 4, 2017, and continuing to on or about August 31, 2017, in the State and Federal District of Nevada,

**JACQUES ANTON LANIER**  
**A.k.a. "John Dupree,"**

defendant herein, while using a facility and means of interstate and foreign commerce, did knowingly, and attempted to, persuade, induce, entice, and coerce, Victim #3, who had not attained the age of 18 years, to engage in prostitution and any sexual activity for which any person could be charged with a criminal offense, to wit: *lewdness with a child*, in violation of Nevada Revised Statutes, Section 201.230(1)(a); *statutory sexual seduction*, in violation of Nevada Revised Statutes, Section 200.368; *sex trafficking*, in violation of Nevada Revised Statutes, Section 201.300(2)(a)(1); *sexual exploitation of children*, in violation of Title 18, United States Code, Section 2251(a); and *sex trafficking of children*, in violation of Title 18, United States Code, Section 1591(a), all in violation of Title 18, United States Code, Section 2422(b).

**COUNT FOUR**  
**Coercion and Enticement**

Beginning on or about April 18, 2017, and continuing to on or about December 6, 2017,  
in the State and Federal District of Nevada,

**JACQUES ANTON LANIER**  
**A.k.a. "John Dupree,"**

defendant herein, while using a facility and means of interstate and foreign commerce, did knowingly, and attempted to, persuade, induce, entice, and coerce, Victim #4, who had not attained the age of 18 years, to engage in prostitution and any sexual activity for which any person could be charged with a criminal offense, to wit: *lewdness with a child*, in violation of Nevada Revised Statutes, Section 201.230(1)(a); *sexual assault*, in violation of Nevada Revised Statutes, Section 200.366(1)(b); *statutory sexual seduction*, in violation of Nevada Revised Statutes, Section 200.368; *sex trafficking*, in violation of Nevada Revised Statutes, Section 201.300(2)(a)(1); and *sex trafficking of children*, in violation of Title 18, United States Code, Section 1591(a), all in violation of Title 18, United States Code, Section 2422(b).

**COUNT FIVE**  
**Coercion and Enticement**

Beginning on or about August 5, 2017, and continuing to on or about October 16, 2017,  
in the State and Federal District of Nevada,

**JACQUES ANTON LANIER**  
**A.k.a. "John Dupree,"**

defendant herein, while using a facility and means of interstate and foreign commerce, did knowingly, and attempted to, persuade, induce, entice, and coerce, Victim #5, who had not attained the age of 18 years, to engage in prostitution and any sexual activity for which any person could be charged with a criminal offense, to wit: *lewdness with a child*, in violation of

1 Nevada Revised Statutes, Section 201.230(1)(a); *statutory sexual seduction*, in violation of Nevada  
 2 Revised Statutes, Section 200.368; *sex trafficking*, in violation of Nevada Revised Statutes,  
 3 Section 201.300(2)(a)(1); *sexual exploitation of children*, in violation of Title 18, United States  
 4 Code, Section 2251(a); and *sex trafficking of children*, in violation of Title 18, United States Code,  
 5 Section 1591(a), all in violation of Title 18, United States Code, Section 2422(b).

6 **COUNT SIX**  
 7 **Sex Trafficking of Children**

8 Beginning on or about August 5, 2017, and continuing to on or about October 16, 2017,  
 9 in the State and Federal District of Nevada,

10 **JACQUES ANTON LANIER**  
 11 **A.k.a. "John Dupree,"**

12 defendant herein, did knowingly, in and affecting interstate and foreign commerce, recruit,  
 13 entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any  
 14 means, Victim #5, having had a reasonable opportunity to observe Victim #5 and knowing and  
 15 in reckless disregard of the fact that Victim #5 had not attained the age of 18 years, and  
 16 knowing and in reckless disregard that Victim #5 would be caused to engage in a commercial  
 sex act, all in violation of 18 United States Code, Section 1591(a) and (b)(2).

17 **COUNT SEVEN**  
 18 **Coercion and Enticement**

19 Beginning on or about April 30, 2017, and continuing to on or about August 28, 2017,  
 20 in the State and Federal District of Nevada,

21 **JACQUES ANTON LANIER**  
 22 **A.k.a. "John Dupree,"**

23 defendant herein, while using a facility and means of interstate and foreign commerce, did  
 24 knowingly, and attempted to, persuade, induce, entice, and coerce, Victim #6, who had not

1 attained the age of 18 years, to engage in prostitution and any sexual activity for which any  
 2 person could be charged with a criminal offense, to wit: *sex trafficking* in violation of Nevada  
 3 Revised Statutes, Section 201.300(2)(a)(1); and *sex trafficking of children* in violation of Title 18,  
 4 United States Code, Section 1591(a), all in violation of Title 18, United States Code, Section  
 5 2422(b).

6 **COUNT EIGHT**  
 7 **Sex Trafficking of Children**

8 Beginning on or about April 30, 2017, and continuing to on or about August 28, 2017,  
 9 in the State and Federal District of Nevada,

10 **JACQUES ANTON LANIER**  
 11 **A.k.a. "John Dupree,"**

12 defendant herein, did knowingly, in and affecting interstate and foreign commerce, recruit,  
 13 entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any  
 14 means, Victim #6, having had a reasonable opportunity to observe Victim #6 and knowing and  
 15 in reckless disregard of the fact that Victim #6 had not attained the age of 18 years, and  
 16 knowing and in reckless disregard that Victim #6 would be caused to engage in a commercial  
 17 sex act, all in violation of 18 United States Code, Section 1591(a) and (b)(2).

18 **COUNT NINE**  
 19 **Coercion and Enticement**

20 Beginning on or about August 30, 2017, and continuing to on or about November 30,  
 21 2017, in the State and Federal District of Nevada,

22 **JACQUES ANTON LANIER**  
 23 **A.k.a. "John Dupree,"**

24 defendant herein, while using a facility and means of interstate and foreign commerce, did

1 knowingly, and attempted to, persuade, induce, entice, and coerce, Victim #7, who had not  
 2 attained the age of 18 years, to engage in prostitution and any sexual activity for which any  
 3 person could be charged with a criminal offense, to wit: *lewdness with a child* in violation of  
 4 Nevada Revised Statutes, Section 201.230(1)(a); *statutory sexual seduction*, in violation of Nevada  
 5 Revised Statutes, Section 200.368; *sex trafficking*, in violation of Nevada Revised Statutes,  
 6 Section 201.300(2)(a)(1); *sexual exploitation of children*, in violation of Title 18, United States  
 7 Code, Section 2251(a); and *sex trafficking of children*, in violation of Title 18, United States Code,  
 8 Section 1591(a), all in violation of Title 18, United States Code, Section 2422(b).

9 **COUNT TEN**  
 10 **Coercion and Enticement**

11 Beginning on or about August 9, 2017, and continuing to on or about November 29,  
 12 2017, in the State and Federal District of Nevada,

13 **JACQUES ANTON LANIER**  
 14 **A.k.a. "John Dupree,"**

15 defendant herein, while using a facility and means of interstate and foreign commerce, did  
 16 knowingly, and attempted to, persuade, induce, entice, and coerce, Victim #8, who had not  
 17 attained the age of 18 years, to engage in prostitution and any sexual activity for which any  
 18 person could be charged with a criminal offense, to wit: *lewdness with a child*, in violation of  
 19 Nevada Revised Statutes, Section 201.230(1)(a); *statutory sexual seduction*, in violation of Nevada  
 20 Revised Statutes, Section 200.368; *sex trafficking*, in violation of Nevada Revised Statutes,  
 21 Section 201.300(2)(a)(1); and *sex trafficking of children*, in violation of Title 18, United States  
 22 Code, Section 1591(a), all in violation of Title 18, United States Code, Section 2422(b).  
 23  
 24



**COUNT ELEVEN**  
**Sex Trafficking of Children**

Beginning on or about August 9, 2017, and continuing to on or about November 29, 2017, in the State and Federal District of Nevada,

**JACQUES ANTON LANIER**  
**A.k.a. "John Dupree,"**

defendant herein, did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means, Victim #8, having had a reasonable opportunity to observe Victim #8 and knowing and in reckless disregard of the fact that Victim #8 had not attained the age of 18 years, and knowing and in reckless disregard that Victim #8 would be caused to engage in a commercial sex act, all in violation of 18 United States Code, Section 1591(a) and (b)(2).

**COUNT TWELVE**  
**Coercion and Enticement**

Beginning on or about August 31, 2017, and continuing to on or about September 7, 2017, in the State and Federal District of Nevada,

**JACQUES ANTON LANIER**  
**A.k.a. "John Dupree,"**

defendant herein, while using a facility and means of interstate and foreign commerce, did knowingly, and attempted to, persuade, induce, entice, and coerce, Victim #10, who had not attained the age of 18 years, to engage in prostitution and any sexual activity for which any person could be charged with a criminal offense, to wit: *human trafficking*, in violation of California Penal Code, Section 236.1; *unlawful sexual intercourse with a person under 18-years-old*, in violation of California Penal Code, Section 261.5; *lewd or lascivious acts*, in violation of

1 California Penal Code, Section 288 (effective September 9, 2010 to December 31, 2018); *oral*  
 2 *copulation*, in violation of California Penal Code, Section 288a (effective September 9, 2013 to  
 3 December 31, 2018); *sex trafficking of children*, in violation of Title 18, United States Code,  
 4 Section 1591(a); and *sexual exploitation of children*, in violation of Title 18, United States Code,  
 5 Section 2251(a), all in violation of Title 18, United States Code, Section 2422(b).

6 **COUNT THIRTEEN**  
 7 **Sex Trafficking of Children**

8 Beginning on or about August 31, 2017, and continuing to on or about September 7,  
 9 2017, in the State and Federal District of Nevada,

10 **JACQUES ANTON LANIER**  
 11 **A.k.a. "John Dupree,"**

12 defendant herein, did knowingly, in and affecting interstate and foreign commerce, recruit,  
 13 entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any  
 14 means, Victim #10, having had a reasonable opportunity to observe Victim #10 and knowing  
 15 and in reckless disregard of the fact that Victim #10 had not attained the age of 18 years, and  
 16 knowing and in reckless disregard that Victim #10 would be caused to engage in a commercial  
 17 sex act, all in violation of 18 United States Code, Section 1591(a) and (b)(2).

18 **COUNT FOURTEEN**  
 19 **Travel with Intent to Engage in Illicit Sexual Conduct**

20 Beginning on or about August 31, 2017, and continuing to on or about September 7,  
 21 2017, in the State and Federal District of Nevada,

22 **JACQUES ANTON LANIER**  
 23 **A.k.a. "John Dupree,"**  
 24

1 defendant herein, traveled in interstate commerce, with a motivating purpose of engaging in  
2 any illicit sexual conduct with Victim #10, all in violation of 18 United States Code, Section  
3 2423(b).

4 **COUNT FIFTEEN**  
5 **Transfer of Obscene Material to Minor**

6 Beginning on or about August 31, 2017, and continuing to on or about September 7,  
7 2017, in the State and Federal District of Nevada,

8 **JACQUES ANTON LANIER**  
9 **A.k.a. "John Dupree,"**

10 defendant herein, did knowingly, and attempted to, while using the mail and any facility and  
11 means of interstate and foreign commerce, transfer obscene matter to Victim #10 who had not  
12 attained the age of 16 years, knowing that Victim #10 had not attained the age of 16 years, all  
13 in violation of Title 18, United States Code, Sections 1470.

14 **FORFEITURE ALLEGATION ONE**  
15 **Coercion and Enticement and Travel with Intent to Engage in Illicit Sexual Conduct**

16 1. The allegations contained in Counts One, Three, Four, Five, Seven, Nine, Ten,  
17 Twelve, and Fourteen of this Criminal Indictment are hereby realleged and incorporated herein  
18 by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 2428(a)(1) and 18  
19 U.S.C. § 2428(b)(1)(A) with 28 U.S.C. § 2461(c).

20 2. Upon conviction of any of the felony offenses charged in counts One, Three  
21 Four, Five, Seven, Nine, Ten, Twelve, and Fourteen of this Criminal Indictment,

22 **JACQUES ANTON LANIER**  
23 **A.k.a. "John Dupree,"**  
24

1 defendant herein, shall forfeit to the United States of America, any property, real or  
2 personal, that was used or intended to be used to commit or to facilitate the commission of  
3 violations of 18 U.S.C. §§ 2422(b) and 2423(b):

4 defendant herein, shall forfeit to the United States of America, any property, real or  
5 personal, used or intended to be used to commit or to facilitate the commission of any violation  
6 of 18 U.S.C. §§ 2422(b) and 2423(b):

7 a. Samsung Galaxy S8 cellular phone, IMEI 355987083990480.

8 b. Green Vibrator recovered from 1827 W. Gowan, #2148, North Las Vegas,  
9 Nevada, on December 21, 2017.

10 3. All pursuant to 18 U.S.C. §§ 2422(b), 2423(b), and 2428(a)(1) and 18 U.S.C.  
11 § 2428(b)(1)(A) with 28 U.S.C. § 2461(c).

12 **FORFEITURE ALLEGATION TWO**  
13 **Sex Trafficking of Children**

14 1. The allegations contained in Counts Six, Eight, Eleven, and Thirteen of this  
15 Criminal Indictment are hereby realleged and incorporated herein by reference for the purpose  
16 of alleging forfeiture pursuant to 18 U.S.C. § 1594(d)(1).

17 2. Upon conviction of any of the felony offenses charged in Counts Six, Eight,  
18 Eleven, and Thirteen of this Criminal Indictment,

19 **JACQUES ANTON LANIER**  
20 **A.k.a. "John Dupree,"**

21 defendant herein, shall forfeit to the United States of America, any property, real or  
22 personal, that was involved in, used, or intended to be used to commit or to facilitate the  
23 commission of 18 U.S.C. § 1591(a), and any property traceable to such property:  
24

- a. Samsung Galaxy S8 cellular phone, IMEI 355987083990480.
- b. Green Vibrator recovered from 1827 W. Gowan, #2148, North Las Vegas, Nevada, on December 21, 2017.

3. All pursuant to 18 U.S.C. §§ 1591(a) and 1594(d)(1).

**FORFEITURE ALLEGATION THREE**  
**Transfer of Obscene Material to Minors**

1. The allegations contained in Count Fifteen of this Criminal Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 1467(a)(1) and 1467(a)(3).

2. Upon conviction of any of the felony offenses charged in Count Fifteen of this Criminal Indictment,

**JACQUES ANTON LANIER**  
**A.k.a. "John Dupree,"**

defendant herein, shall forfeit to the United States of America, any obscene material produced, transported, mailed, shipped, or received in violation of 18 U.S.C. § 1470:

defendant herein, shall forfeit to the United States of America, any property, real or personal, used or intended to be used to commit or to promote the commission of 18 U.S.C. § 1470:

- a. Samsung Galaxy S8 cellular phone, IMEI 355987083990480.
- b. Green Vibrator recovered from 1827 W. Gowan, #2148, North Las Vegas, Nevada, on December 21, 2017.

13